

ATTACHMENT A

STIPULATION OF FACTS

The undersigned parties stipulate and agree that if this case had proceeded to trial, this Office would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.

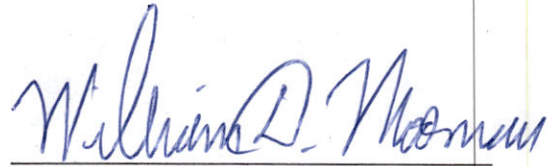
On January 18, 2021, in the District of Maryland, the Defendant, **ANDRON RYDEAL WOOD** ("**WOOD**"), knowingly and willfully conspired with **Thaddeus Lamont Wills** ("**Wills**"), **Quasean Markual Reeves** ("**Reeves**"), and **Keionta Shawn Hagens** ("**Hagens**") to obstruct, delay and affect commerce and the movement of an article and commodity in commerce by robbery, as that term is defined in 18 U.S.C. § 1951(b)(1), by the unlawful taking of property from the person and presence of others, against their will, by means of actual and threatened force, violence, and fear of injury, and did in fact commit such robbery.

On January 18, 2021, **Wills** contacted **WOOD**, and **WOOD** picked up **Wills**, **Reeves**, and **Hagens** at the residence of **Wills** and **Hagens** in Waldorf, Maryland. Business-1 was located on Livingston Road in Fort Washington, Maryland and sold various items including sweets, beverages, beer, wine, tobacco products, hats, and clothing items. At some point, **WOOD** drove **Wills**, **Reeves**, and **Hagens** to a location near Business-1, and dropped them off. **WOOD** drove to Business-1, went inside, looked around, conducted a transaction, and left. Security video of Business-1 captured **WOOD** inside and outside the business. **WOOD** called **Hagens'** phone and then drove to a nearby neighborhood and waited. **WOOD** knew that **Wills**, **Reeves**, and **Hagens** intended to rob Business-1.

Wills, **Reeves**, and **Hagens** entered Business-1, with the intent to rob Business-1, wearing face coverings, and armed with at least two firearms. As shown on the security video of Business-1, **Wills**, **Reeves**, and **Hagens** (collectively "the robbers") initially tried to act as customers. One of the robbers took a belt from off a display rack. The robbers approached the checkout counter and Victim-1 was behind the counter in a locked bullet proof glass enclosure. Two of the robbers displayed and discharged firearms through openings in the enclosure. One of the robbers, still with the belt in his possession, reached inside an opening in the protective enclosure. Victim-1 was shot by the robbers during the robbery. One of the robbers who had possessed and discharged a firearm, and another who had the belt, then left Business-1. The third robber unsuccessfully attempted to enter the protective enclosure, and eventually left the store, after taking items from a customer including the customer's keys, wallet, and motor vehicle. The store worker died as a result of gunshot wounds received during the robbery. Shortly after the shooting, **Hagens** called **WOOD**, who picked up two of the robbers and drove them away.

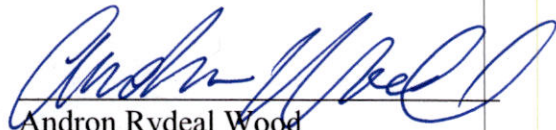
Business-1 engaged in interstate commerce in ways including the sale of products produced and manufactured outside of Maryland. The robbery of Business-1 on January 18, 2021, delayed, obstructed, and affected interstate commerce.

SO STIPULATED:

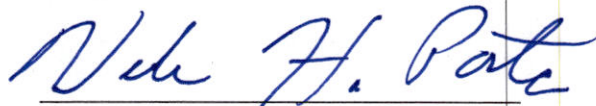


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